



December 7, 2020

VIA ELECTRONIC FILING

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, New York 10007

Re: Constantino Kosmidis v. The Port Authority of New York and New Jersey, et al.
Docket No.: 1-18-cv-08413-AJN

Dear Judge Nathan:

This office represents Defendants, The Port Authority of New York and New Jersey and the individually named officers in the above-referenced matter. Pursuant to the Court's order filed on November 30, 2020 (D.E. 84), any summary judgment motions shall be filed within 30 days. The parties have conferred regarding the deadline to file dispositive motions and jointly request an extension to file their briefs until February 1, 2021. This extension is requested, in part, based upon the continuing pandemic and the shutdown of the New York City public schools, which has impacted Defense counsel's work schedule. Defense counsel will also be taking vacation time to care for her children from December 21, 2020 through January 8, 2021. Plaintiff's counsel consents to this request and has requested the same extension to file a brief on Plaintiff's behalf. This is the first request for an extension to file motions for summary judgment.

We thank the Court for its courtesies and attention to this matter.

Respectfully submitted,

By: /s/ Cheryl N. Alterman
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cc: Jeffrey A. Rothman, Esq.
(via ECF)

The request for an extension is hereby
GRANTED. Any summary judgment motions
are due by February 1, 2021. Oppositions are
due one month thereafter, and any replies are
due two weeks after the oppositions are filed.
SO ORDERED.

12/8/2020